

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

INNOVATIVE ACCOUNTING SOLUTIONS,  
INC.,

Plaintiff,

v.

CREDIT PROCESS ADVISORS, INC., *et al.*  
Defendants.

Case No.: 1:15-cv-00793-PLM-PJG  
Hon. Judge Paul L. Maloney  
Magistrate Phillip J. Green

**BRIEF IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL FOR  
DEFENDANT CREDIT PROCESS ADVISORS, INC.**

Charity A. Olson requests that the Court enter an order permitting withdrawal of her appearance on behalf of Defendant Credit Process Advisors, Inc. ("CPA"), only.

The Michigan Rules of Professional Conduct describe the circumstances upon which a lawyer may withdraw from representation of a client. MRPC 1.16(b) provides in relevant part:

[A] lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if:

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(4) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;

(5) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or

(6) other good cause for withdrawal exists.

MRPC 1.16(b).

In this case, there has been an incurable breakdown in the attorney-client relationship such that undersigned counsel cannot continue to represent CPA in this matter. Upon information and belief, CPA elected not to retain Varnum, LLP, following my resignation from Varnum, and has ceased communications with undersigned counsel regarding this matter. This breakdown

constitutes good cause for withdrawal from this case. *Ambrose v. The Detroit Edison Co*, 65 Mich. App. 484, 488 (1975); *Genrow v. Flynn*, 166 Mich. 564, 567-68 (1911) (“The relations between attorney and client are of a delicate and confidential nature. They should have faith in each other, and their relations should be such that they can cordially cooperate.”).

CPA has been advised of the basis for this motion and will be contemporaneously served with a copy of said motion at its last known address should they choose to oppose the requested relief.

WHEREFORE, Charity A. Olson requests that the Court enter an order permitting the withdrawal of undersigned counsel as counsel on behalf of Defendant Credit Process Advisors, Inc., only, and granting such other and further relief as is just and proper.

Dated: March 1, 2021

Respectfully Submitted,

/s/ Charity A. Olson  
Charity A. Olson (P68295)  
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*Attorneys for Defendants Account  
Adjustment Bureau, Inc., and Credit Process  
Advisors, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2021, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system, and by U.S. First Class Mail to any parties that do not receive electronic filing notifications from the Court. Parties may also access this filing through the PACER ECF system.

/s/ Charity A. Olson  
Charity A. Olson (P68295)  
**OLSON LAW GROUP**